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Co-Lead Counsel for Plaintiffs and the Settlement Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: ZOOM VIDEO COMMUNICATIONS,
INC. PRIVACY LITIGATION

Master Case No. 3:20-cv-02155-LB

This Document Relates To:

**DECLARATION OF BRIAN YOUNG IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPEAL BOND**

All Actions

Judge: Hon. Laurel Beeler
Date: April 27, 2023
Time: 9:30 a.m.
Location: Courtroom B, 15th Floor

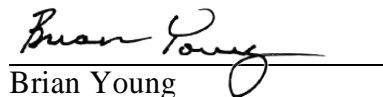
1 I, Brian Young, hereby declare and state as follows:

2 1. I am over the age of eighteen and am fully competent to make this declaration. I make
3 this declaration based upon personal knowledge, and if called to testify as a witness, could and would
4 competently testify to the matters stated herein.

5 2. I am the Senior Project Manager at Epiq Class Action and Claims Solutions, Inc.
6 (“Epiq”), the Court-appointed Class Administrator for this case. In this capacity, I oversee Epiq’s day-
7 to-day duties, including dissemination of class notice, review and approval of claims, communications
8 with potential Settlement Class Members, posting and updating the Settlement Website and toll-free
9 number, and preparing the Settlement Funds for final distribution pursuant to the Court-approved plan
10 of allocation. At this stage of the case, all claims have been reviewed and the distribution is now ready
11 to be made to eligible Settlement Class Members.

12 3. Based on Epiq’s work to date providing administrative support in this case, we estimate
13 that the cost to maintain the account while the case is on appeal is approximately \$23,500 per month.
14 This amount includes costs necessary to maintain and administer the Settlement Website and toll-free
15 phone number, claimant support and communications from potential Settlement Class Members,
16 project and data management, bank account and tax management, and document storage.

17
18 I declare under penalty of perjury that the foregoing is true and correct. Executed on March 10,
19 2023 in Portland, Oregon.

20
21 
22 Brian Young